

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|----------------|---|-------------------------------------|
| In Re: |) | Case No. 16-47515-659 |
| |) | |
| Shannon McNeil |) | Chapter 13 |
| Debtors, |) | Motion to Retain Insurance Proceeds |

Notice of Motion

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THIS MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING, THE DATE OF WHICH WILL BE SENT TO YOU IF YOU FILE A RESPONSE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

Motion to Retain Insurance Proceeds

Comes Now Debtors, by and through their attorney, and for their motion states as follows:

1. Debtor filed for Chapter 13 October 18, 2016 in the Eastern District of the State of Missouri as Cause #16-47515
2. Debtors plan was confirmed on December 15, 2016.
3. Debtor received a check in the amount of \$18,799.15 as payment from a life insurance policy on his wife that passed away on February 11, 2017.
4. Debtor had additional bills for the the headstone, the newspaper that totaled, \$1,975.00
5. Debtor is in dire need of a new vehicle as the transmission was replaced last year and has gone out again so does not run. Debtor has no other means of transportation and needs a new car to get to work and for his family.
6. Debtor has looked at cars and can buy a used GMC Terrain from Dave Sinclair for \$16, 509.00 not including taxes. Debtor needs a dependable auto as he is now the only surviving parent and has three children living at home with him.

Wherefore, Debtors requests an order from the Court Allowing debtor to keep \$18,799.15 insurance proceeds to pay the above funeral expenses and to buy an automobile so that he will have reliable transportaion, and for such other relief as this Court deems appropriate.

Date: July 20, 2017

Respectfully submitted,
/s/ William H. Ridings, Jr.
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CERTIFICATE OF SERVICE

Copy served on the following either through the courts ECF system or by ordinary mail
on July 20, 2017

/s/ William H. Ridings, Jr.

John V. LaBarge, Jr., Standing Chapter 13 Trustee, P. O. Box 430908, St. Louis, MO, 63143

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St.Louis, MO 63102

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American Education Services PO Box 61047 Harrisburg, PA 17106

American InfoSource LP as agent for T Mobile/T-Mobile USA Inc PO Box 248848
Oklahoma City, OK 73124-8848

Choice Recovery 1550 Old Henderson Rd Columbus, OH 43220

Educational Credit Management Corporation P.O. Box 16408 St. Paul, MN 55116-0408

ERC PO Box 57547 Jacksonville, FL 32241

Heights Finance Co 228 Regional Dr Alton, IL 62002

IRS PO Box 7346 Insolvency Unit Philadelphia, PA 19101

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Missouri Department of Revenue PO Box 475 301 W High St Jefferson City MO 65105-0475

Missouri Dept of Rev 301 W High St Jefferson City, MO 65105

National Healthcare Collections LLC 700 Spirit of St. Louis Blvd, Ste B Chesterfield, MO 63005

PHEAA PO BOX 8147 HARRISBURG PA 17105

Reviver Financial, LLC PO Box 3023 Attn: Bankruptcy Department Hutchinson, KS 67504

Senex Services 3333 Founders Road 2nd Floor Indianapolis, IN 46268

St. Louis County Collector 41 S Central Saint Louis, MO 63105

St. Louis South Oral and Maxillofacial Surgery Inc 9911 Kennerly Ste E Saint Louis, MO 63128-703

Title Max 6259 Ronald Reagan Dr Lake Saint Louis, MO 63367

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